

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE GALECTIN THERAPEUTICS,)
INC. DERIVATIVE LITIGATION)
)
)

CIVIL ACTION NO.
1:15-cv-00208-SCJ

**CONSENT MOTION FOR EXTENSION OF TIME FOR
DEFENDANTS TO RESPOND TO COMPLAINT AND TO SET
BRIEFING SCHEDULE IF DEFENDANTS' MOVE TO DISMISS**

Defendants Peter Traber, James Czirr, Gilbert Amelio, Kevin Freeman, Arthur Greenberg, Rod Martin, John Mauldin, Steven Prelack, Herman Paul Pressler, Marc Rubin, and Jack Callicutt (the “Individual Defendants”) and nominal Defendant Galectin Therapeutics, Inc. (“Galectin”) (collectively, “Defendants”) and Plaintiffs David Hasbrouck and Sui Yip (“Plaintiffs”), pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, respectfully file this consent motion (the “Motion”) requesting an extension of time for Defendants to respond to Plaintiffs’ Verified Consolidated Shareholder Derivative Complaint (the “Complaint”) and a briefing schedule in the event Defendants move to dismiss the Complaint. In support of this Motion, the parties show as follows:

1. Pursuant to the Court’s January 28, 2015 Order granting the Parties’ Joint Motion for Entry of a Scheduling Order (Dkt. #49), the deadline for

Defendants to file a responsive pleading to Plaintiffs' Complaint is March 30, 2015, thirty (30) days from the docketing of Plaintiffs' Complaint (Dkt. # 58);

2. Defendants request a seven (7) day extension of time, through and including April 6, 2015, to answer or otherwise respond to the Complaint;

3. It is within the Court's discretion to extend the time for parties to file motion papers for good cause, upon motion, when the motion is made before the original time expires, *see* Fed. R. Civ. P. 6(b);

4. The deadline for the submission of Defendants' response to the Complaint has not passed;

5. Counsel for the parties have conferred on the proposed extension and have agreed to an extension of the deadline for filing Defendants' response to the Complaint to on or before April 6, 2015; and

6. The parties have further agreed to the following briefing schedule in the event Defendants move to dismiss the Complaint:

(1) Plaintiffs shall file any opposition to Defendants' motion to dismiss the Complaint on or before May 13, 2015; and

(2) Defendants shall file any reply in support of their motion to dismiss the Complaint on or before May 28, 2015.

7. Both parties consent to this Motion, as evidenced by the signatures below.

WHEREFORE, the parties respectfully request that the Court grant this Motion to extend the time for Defendants to respond to Plaintiffs' Complaint and to set a briefing schedule in the event Defendants move to dismiss the Complaint, and enter an order that:

- (1) Defendants shall file their motion to dismiss the Complaint on or before April 6, 2015;
- (2) Plaintiffs shall file any opposition to Defendants' motion to dismiss the Complaint on or before May 13, 2015; and
- (3) Defendants shall file any reply in support of their motion to dismiss the Complaint on or before May 28, 2015.

A proposed Consent Order granting this Motion is attached hereto.

Respectfully submitted this 27th day of March 2015.

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CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2015, I electronically filed the foregoing **CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS TO RESPOND TO COMPLAINT AND TO SET BRIEFING SCHEDULE IN THE EVENT DEFENDANTS MOVE TO DISMISS** with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Courts electronic filing system.

/s/ Benjamin Lee _____
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